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BURDEN

State of California)
County of Los Angeles) ss

AFFIDAVIT

I Gerry Armstrong, of Los Angeles California, hereby depose and state the following:

1. That I am a member of the Church of Scientology of California and am employed by this Church.

2. That from July 1976 to December 1977 I was working within a section of the Church known as the Rehabilitation Project Force hereinafter referred to as the RPF at the Church of Scientology of California located in Clearwater Florida.

3. That from August 1977 up through November 1977 I had personally known and had the opportunity to observe an individual known to me as Tonja Burden.

4. That during this period of August 1977 to November 1977 Tonja Burden was also working in the RPF at the Church located in Clearwater Florida.

5. That I have read an affidavit signed by Tonja Burden dated 25 January 1980, in which she describes living and working conditions Tonja claims to have existed in the RPF during the time period of August 1977 to November 1977.

6. On page 9 of Tonja Burden's affidavit she swears that: "In the RPF you were labeled 'treasonous'..." I personally know that no one was labeled 'treasonous' because they were in the RPF, including Tonja Burden.

7. On page 9 and 10 of Tonja Burden's affidavit she swears that: "and forced to work 18 hours a day, 7 days a week" in regards to the schedule she alleged to have had to maintain in the RPF. I personally know that neither Tonja Burden nor anyone else worked a schedule of 18 hours a day for 7 days a week. The actual schedule of the RPF was as follows; 8 hours of work a day; 7½ hours of sleep; ½hour for each meal break three times a day; ½hour for hygiene; ½hour for a meeting of all individuals in the RPF;and 6 hours devoted to spiritual counseling or training to be able to administer spiritual counseling to another.This was the schedule that I personally observed Tonja Burden adhere to while she was in the RPF from August 1977 to November 1977.

8. On page 10 of Tonja Burden's affidavit she swears that: "and often times received only 'rice and beans' and water" in regards to the food she alleged to have received. I personally know that Tonja Burden never ate only rice and beans and water while on the RPF. I also personally know that no one else ate only rice and beans and water while Tonja Burden was on the RPF from August 1977 to November 1977.

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8.(cont.) I personally observed that Tonja Burden ate a well balanced diet including fruits, vegtables, meats, dairy products, and ootained plenty of nutrition.

9. On page 10 of Tonja Burden's affidavit she swears that: "I personally observed a person chained to pipes in the boiler room in the Fort Harrison building for a period of weeks." I personally know that no one was ever chained to pipes in the boiler room of the Fort Harrison building nor was any one ever chained anywhere else. I personally know that the longest period of time any one individual would work in the boiler room area of the Fort Harrison building was 4 days to 1 week at approximately 13 to 14 hours in any one day.

10. On page 10 of Tonja Burden's affidavit she swears that: "In the RPF I saw people screaming and crying during the constant 'auditing' on the E-Meter." I have personally observed more than 20,000 hours of individuals receiving "auditing" including during the time period which Tonja Burden was in the RPF. During this time I never observed Tonja Burden or anyone else to scream while receiving "auditing"

11. On page 10 of Tonja Burden's affidavit she swears that: "The E-Meter is a lie detector used during auditing." I personally know that the E-Meter is not a lie detector but is a religious artifact designed to be used as an aid in spiritual counseling (auditing) and that no claims are made to it with respect to the E-Meter being able to cure,diagnose or otherwise prevent or detect any disease, ailment or other such claim. I also personally know that Tonja Burden was aware of the true function of the E-Meter as is every individual who receives auditing when the E-Meter is used.

12. On page 10 of Tonja Burden's affidavit she swears that: "RPF prisoners were forced to undergo 'auditing' in order to 'audit out' their evil purposes against Hubbard and Scientology." I personally know that no one was a prisoner while in the RPF, including Tonja Burden. I know that if any individual desired to leave the RPF they were free to do so and I have observed several individuals leave the RPF UPON REQUEST.
I also personally know that neither Tonja Burden nor anyone else was ever forced to undergo "auditing" while in the RPF or in other sections within the Church. The rule in the RPF was that if an individual did not want to get auditing they would not get auditing as the entire procedure of auditing depends entirely on one receiving it on one's own free will.

12.(cont.) I also personally know that neither Tonja Burden nor anyone else was forced to "audit out" any evil purposes against Hubbard, Scientology or other associated entity or individual. I know that Tonja Burden only had access to one individual's confessional folder, a record of the auditing sessions of the individual, and has no knowledge on other person's spiritual states than this one individual.

13. On page 10 of Tonja Burden's affidavit she swears that: "I virtually cried the whole time I was in the RPF." I find this statement to be entirely false. From the period of August 1977 to November 1977 while in the RPF with Tonja Burden, I spoke with and saw her at least once every day, usually several times a day and only once during this entire period was Tonja Burden ever crying, at which time I spoke with her in effort to cheer her up.

14. On page 10 and 11 of Tonja Burden's affidavit she swears that: "approximately two weeks after I returned to Las Vegas two of Hubbards agents came to my house and told me that Hubbard wanted to see me. I told them I would never return. They then asked if I would go for a cup of coffee with them. After a short while I agreed to have coffee. I got in the car, in the front seat, and sat between the two agents. After driving a few minutes, I noticed we were driving to the highway, and I asked where we weregoing. They told me I was being taken to Los Angeles to see Hubbard." In regards to the incident Tonja Burden describes, I have personal knowledge. On or around December 1977 after Tonja Burden left the RPF and went to her parents in Las Vegas, my wife and I went to Las Vegas to see Tonja at her home. As my wife and I had been friends with Tonja, we were concerned as to her unnanounced departure from the Church. When my wife and I arrived at Tonja's house we were invited in and spoke with her and her mother. My wife and I spoke to Tonja and both of her parents several times during the course of that day. Tonja told us that it was her intention to leave the Church and we told her that she was perfectly free to do so. We also told her that if some point in the future she wished to again become associated with the Church, that it would be best if she routed out of the Church honestly following the administrative policies for such matters. Both of Tonja's parents, who had also left the Church of Scientology several years earlier agreed with this and expressed to Tonja that leaving the Church was best done following the administrative policies. Tonja then agreed with this and agreed to return to Los Angeles and route out of the Church honestly. She packed some clothes as she knew it would take several days and got into the car with us and left for LA. Tonja fully understood during the trip to LA that she was returning to route out of the Church honestly. At no time during this trip or prior to it did my wife or I stop for coffee, or use any such ploy as going out for a cup of coffee in an attempt to take Tonja to LA. Neither my wife

14.(cont.) nor I stated to Tonja at any point of our conversation with her at her house, enroute to LA or any other time that Hubbard wanted to see her or that she was being taken to Los Angeles to see Hubbard.

15. On page 11 of Tonja Burden's affidavit she swears that: "In Los Angeles I was locked in a room and forced to undergo a'security check'on the E-Meter." I personally know that while in Los Angeles Tonja Burden was never locked in any room or otherwise confined in any manner. I also know that Tonja was never forced to undergo a security check on the E-Meter or forced to undergo any other activity with or with out the E-Meter.During this time period while Tonja Burden was in Los Angeles she expressed to me that she knew she was doing the right thing by routing out of the Church honestly by following the Church's administrative policies.

16. I swear under penalty of perjury that the above statements are true to the best of my knowledge and are made entirely on my own free will.

Signed: Glenn Olney

Date: 12 April 1980

Sworn & subscribed to before me this 12th day of April 1980

Ellen P. Lansky

OFFICIAL SEAL
ELLEN P. LANSKY
NOTARY PUBLIC - CALIFORNIA
PRINCIPAL OFFICE IN
LOS ANGELES COUNTY
My Commission Expires January 10, 1981